

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

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|                                        |   |                             |
|----------------------------------------|---|-----------------------------|
| BABY DOE, A CITIZEN OF AFGHANISTAN     | : |                             |
| CURRENTLY RESIDING IN NORTH            | : |                             |
| CAROLINA, BY AND THROUGH NEXT          | : | CIVIL ACTION NO. 3:22-CV-49 |
| FRIENDS, JOHN AND JANE DOE; AND JOHN   | : |                             |
| AND JANE DOE, CITIZENS OF AFGHANISTAN: | : |                             |
| AND LEGAL GUARDIANS OF BABY DOE,       | : |                             |
|                                        | : |                             |
| Plaintiffs,                            | : |                             |
|                                        | : |                             |
| v.                                     | : |                             |
|                                        | : |                             |
| JOSHUA MAST, STEPHANIE MAST, RICHARD   | : |                             |
| MAST, KIMBERLEY MOTLEY, AND AHMAD      | : |                             |
| OSMANI,                                | : |                             |
|                                        | : |                             |
| Defendants,                            | : |                             |
|                                        | : |                             |
| and                                    | : |                             |
|                                        | : |                             |
| UNITED STATES SECRETARY OF STATE       | : |                             |
| ANTONY BLINKEN AND UNITED STATES       | : |                             |
| SECRETARY OF DEFENSE GENERAL           | : |                             |
| LLOYD AUSTIN,                          | : |                             |
|                                        | : |                             |
| Nominal Defendants.                    | : |                             |

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**REPLY IN SUPPORT OF PLAINTIFFS’ NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiffs filed on April 3, 2023, a Notice of Supplemental Authority (“Notice”) (ECF No. 198) advising the Court of the decision of the circuit court judge to vacate the adoption order obtained by Defendants Joshua and Stephanie Mast. As Plaintiffs noted, the circuit court found that Plaintiffs John and Jane Doe were deprived of due process and that the order was procured through extrinsic fraud.

Defendants Joshua and Stephanie Mast responded to the Notice on April 4, 2023, asserting that

Plaintiffs “misrepresent[ed] what the Circuit Court said[.]”<sup>1</sup> ECF No. 199 at 1.

Rather than debate “what the Circuit Court said,” Plaintiffs now provide the Court with the relevant portion of the transcript from the March 30, 2023 hearing, setting forth the court’s ruling.<sup>2</sup> *See* Exh. 1. A written order memorializing the court’s ruling is forthcoming.

Dated: April 17, 2023

Respectfully submitted,

/s/ Maya Eckstein

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<sup>1</sup> The Masts’ response to the Notice makes further assertions regarding mootness that have not been raised in any motion before this Court. Plaintiffs will address them if and when such a motion is filed. With respect to the Masts’ assertion that the circuit court “rejected Plaintiffs’ federal preemption arguments and said that the adoption proceeding did not implicate U.S. foreign policy,” ECF No. 199 at 2, Plaintiffs will let the circuit court’s transcript speak for itself. *See* Exh. 1.

<sup>2</sup> Pursuant to the circuit court’s order that the parties to that proceeding be referenced by initials, the transcript reflects one redaction. *See* ECF 137, Exh. 10.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of April, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants.

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